

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL NO.: 09-272</b>
<b>v.</b>	*	<b>SECTION: "N"</b>
<b>THOMAS G. STEELE</b>	*	<b>VIOLATION: 18 U.S.C. § 1001</b>

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**FACTUAL BASIS**

Should this matter have gone to trial, the Government would have proved, through the introduction of competent testimony and admissible tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the Bill of Information now pending against the defendant, **THOMAS G. STEELE**. The defendant has agreed to plead guilty as charged in the Bill of Information charging him with making false statements to an agency of the United States in violation of Title 18, United States Code, Section 1001.

On or about June 8, 2007, **THOMAS G. STEELE** applied for a Louisiana Road Home grant to obtain funds for repairs to Katrina related damages sustained to the property located at 203 Planters Canal Road, Belle Chasse, LA 70037, in the Eastern District of Louisiana. In his application, **STEELE** said he was the owner and occupant of the property located at 203 Planters Canal Road, Belle Chasse, LA 70037 and that it was his primary residence on August 29, 2005,

when Hurricane Katrina made landfall in the Eastern District of Louisiana. A certified copy of defendant's Road Home application and attachments would be offered as evidence at trial.

On June 6, 2008, **THOMAS G. STEELE** was interviewed by Special Agents of the Federal Bureau of Investigation (FBI) in Las Vegas, Nevada regarding his Road Home application. The defendant **THOMAS G. STEELE** admitted that he was living in Las Vegas, Nevada at the time of Hurricane Katrina and was not residing at 203 Planters Canal Road, Belle Chasse, LA 70037. Additionally, defendant did not become the full, 100 percent lawful owner of 203 Planters Canal Road, Belle Chasse, LA 70037 until April 3, 2006 when an Act of Exchange was recorded under number 2006-00001895 with the Clerk of Court for Plaquemines Parish.

If called to testify, G. S. and S. S., the property managers of Miracle Mile mobile home park, located at 3642 Boulder Highway, Las Vegas, Nevada 89121, would state that the defendant **THOMAS G. STEELE**, resided at the mobile home park from approximately July 1999 until October 2005 and that he paid his rent in person every month. A certified copy of a rental payment history for **THOMAS G. STEELE** at the Mobile Home park which shows payments made for August -October 2005 would be offered as evidence at trial.

Certified Records from the custodian of records of the University of Nevada Las Vegas (UNLV) including a University transcript would show that **THOMAS G. STEELE** was a student in the Masters of Education program at UNLV from Fall 1999 through Fall 2005. The records would further establish that **STEELE** took classes during the 2005 Fall semester at UNLV and was considered a Nevada resident.

A Special Agent of the U.S. Department of Homeland Security, Office of Inspector General, would testify that **THOMAS G. STEELE** received a Louisiana Road Home grant in the amount of \$119,935 for repairs to property located at 203 Planters Canal Road, Belle Chasse, LA 70037. A certified copy of check no. 000038393 for \$119,935 made payable to **THOMAS STEELE** would be offered as evidence at trial.

A Special Agent of the United States Department of Housing and Urban Development, Office of Inspector General (HUD-OIG) would testify that HUD is a federal agency and that as a result of legislation passed by Congress, funds were appropriated to HUD for a Community Development Block Grant (“CDBG”) for Louisiana Hurricane victims. The purpose of CDBG was to assist and aid owners of property damaged or destroyed by Hurricane Katrina and Rita in September of 2005. The grant money was disbursed under the program known as the Louisiana Road Home Program (the “Program”). HUD prepared the rules and regulations governing the disbursement of grant money through the state of Louisiana and the State, through the Office of Community Development, Division of Administration contracted with ICF International Inc. to administer the Program and the federal grant funds.

A Special Agent of HUD-OIG would further testify that the two major requirements for receiving Louisiana Road Home grant money was the applicant must have been the owner of the damaged property on August 29, 2005 and the property was the primary resident of the applicant on August 29, 2005.

Both the Government and the defendant, **THOMAS G. STEELE**, do hereby stipulate and agree that the above facts set forth a sufficient factual basis for the crime to which the defendant is pleading guilty and that the government would have proven these facts beyond a reasonable doubt at trial.

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THOMAS G. STEELE  
Defendant

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DATE

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CINDY CIMINO  
Counsel for Defendant

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DATE

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JULIA K. EVANS  
Assistant United States Attorney

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DATE